

EXHIBIT E

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, JULIEANNA)
MUNIZ, ELIZA CAMBAY, SAL) Case No.:
CATALDO, EMIR GOENAGA, JULIAN) 3:20-cv-04688
SANTIAGO, HAROLD NYANJOM, KELLIE)
NYANJOM, and SUSAN LYNN HARVEY,)
individually and on behalf of all)
others similarly situated,)
Plaintiffs,)
vs.)
GOOGLE LLC,)
Defendant.)
-----)

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

REMOTE PROCEEDINGS OF THE
VIDEOTAPED DEPOSITION OF ARNE DE BOOIJ
TUESDAY, FEBRUARY 7, 2023

REPORTED BY NANCY J. MARTIN
CSR. NO. 9504, RMR, RPR
PAGES 1-133

1 Q. And can you elaborate on what [REDACTED] is.

2 A. It was a project name. I mean I don't
3 remember the specifics. It included, based on this
4 and memory, a change to the -- definitely to the
5 consent I think or engagement, and I think primarily
6 it was related to account creation in Europe. Yep.

7 Q. If you know, is there a [REDACTED]

8 A. Yes, there is a [REDACTED]

9 Q. What was the difference, if anything, between
10 [REDACTED] and [REDACTED] aside from the number?

11 MS. AGNOLUCCI: Objection. Foundation.

12 THE WITNESS: I mean they are both projects
13 focused on different things, a lot of different
14 things. But I don't sort of -- I can't sort of give a
15 complete answer to what exactly the difference was
16 between them. There was a lot of different things
17 happening in both, probably.

18 BY MR. FRAWLEY:

19 Q. Do you know why the name was given as
20 [REDACTED]?

21 MS. AGNOLUCCI: Objection. Vague.

22 THE WITNESS: I don't know exactly. You mean
23 [REDACTED] why the name was [REDACTED]

24 BY MR. FRAWLEY:

25 Q. The word [REDACTED], " was there some

1 significance to that choice?

2 MS. AGNOLUCCI: Same objection.

3 THE WITNESS: I don't remember if there was
4 significance to that.

5 BY MR. FRAWLEY:

6 Q. Okay. And can you tell me what is meant by
7 "Express [REDACTED]"

8 A. Yes. It's a code name for one of the options
9 or design directions that was part of the [REDACTED]
10 project.

11 Q. What was the specific object or direction
12 that [REDACTED] was code name for?

13 A. Are you talking about this point in time,
14 when this document was written?

15 Q. Sure. We can start there.

16 A. Yeah. I think it was the code name for a
17 design direction that included something called
18 "Express." Express path, probably, is the right word.
19 Above it, it says manual path. So "express" means
20 express path.

21 Q. Do you see where in the -- still on the first
22 page it says, "Hypothesis & Research Questions"?

23 A. Yes.

24 Q. What is meant by "Hypothesis"?

25 A. Hypothesis in research -- it's common in

1 research practice, it means an assumption or -- so
2 it's not theory or not a fact. It's basically
3 something that we believe may or may not be the case,
4 and we describe that for the purposes of running the
5 research.

6 Q. Okay. Can you look at -- so if you look at
7 the bottom of this page, do you see where it says,
8 "Research Question, Goal, Hypothesis"?

9 A. Yes.

10 Q. And then if you just flip, it looks like --
11 well, would you agree with me that the next couple
12 pages just have lists of questions, goals, and
13 hypothesis -- hypotheses? Does that look right to
14 you?

15 A. Like there's three columns, and I would agree
16 that the first column, is "Research questions," the
17 second, "Goal," and the third, "Hypothesis."

18 Q. Okay. And can you look at the page ending in
19 -299.R?

20 A. Yes.

21 Q. And do you see, like a little bit under
22 halfway down the page in the "Hypothesis" column it
23 says, "Most respondents will believe that turning off
24 WAA will result in no data being collected from their
25 activity and no personalization in Google products and

C E R T I F I C A T E

I do hereby certify that the aforesaid testimony was taken before me, pursuant to notice, at the time and place indicated; that said deponent was by me duly sworn to tell the truth, the whole truth, and nothing but the truth; that the testimony of said deponent was correctly recorded in machine shorthand by me and thereafter transcribed under my supervision with computer-aided transcription; that the deposition is a true and correct record of the testimony given by the witness; and that I am neither of counsel nor kin to any party in said action, nor interested in the outcome thereof.



Nancy J. Martin, RMR, CSR

Dated: February 8, 2023

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